

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VERIFIRE NETWORK SOLUTIONS, LLC, Plaintiff, v. ADTRAN, INC., Defendant.	Case No. 2:15-cv-927 PATENT CASE JURY TRIAL DEMANDED
VERIFIRE NETWORK SOLUTIONS, LLC, Plaintiff, v. HILLSTONE NETWORKS CORP., Defendant.	Case No. 2:15-cv-937 PATENT CASE JURY TRIAL DEMANDED

**AGREED MOTION FOR DISMISSAL WITH PREJUDICE OF ALL CLAIMS
BETWEEN PLAINTIFF VERIFIRE AND DEFENDANT HILLSTONE**

Plaintiff VeriFire Network Solutions, LLC (“VeriFire”) and Defendant Hillstone Networks Corp. (“Hillstone”), pursuant to Federal Rule of Civil Procedure 41 and their agreement, hereby move for an order dismissing all claims by Plaintiff VeriFire against Defendant Hillstone made therein, with prejudice, with each party to bear its own costs, attorneys’ fees and expenses.

WHEREAS entry of default was made on July 27, 2015 due to Hillstone’s unintentional failure to respond to the Complaint because it had not received timely notice from its agent for service;

WHEREAS the parties stipulate that there is good cause to set aside the entry of default and resolve the dispute;

Wherefore, Plaintiff VeriFire respectfully requests that the Court enter the proposed order of dismissal submitted herewith.

Dated: September 29, 2015

Respectfully submitted,

/s/ Craig Tadlock

Craig Tadlock

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VeriFire Network Solutions, LLC

CERTIFICATE OF CONFERENCE

I hereby certify that on September 29, 2015, I conferred by email with counsel for Defendant. Defendant's counsel has agreed to the form and substance of this motion. Accordingly, this motion is an agreed motion.

/s/ Keith Smiley

Keith Smiley

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 29, 2015.

/s/ Craig Tadlock

Craig Tadlock